

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

JOHN HANCOCK LIFE INSURANCE  
COMPANY, JOHN HANCOCK VARIABLE  
LIFE INSURANCE COMPANY, and  
MANULIFE INSURANCE COMPANY (f/k/a  
INVESTORS PARTNER INSURANCE  
COMPANY),

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendants.

CIVIL ACTION NO. 05-11150-DPW  
Hon. Judge Douglas P. Woodlock

**ABBOTT'S MOTION TO IMPOUND EXHIBITS A-C TO THE MOTION FOR LEAVE  
TO FILE A REPLY BRIEF IN SUPPORT OF ITS MOTION IN LIMINE TO EXCLUDE  
THE TESTIMONY OF MR. ALAN FRIEDMAN**

Pursuant to Local rule 7.2, Defendant Abbott Laboratories ("Abbott") respectfully moves for leave to file the exhibits to its Motion for Leave to File a Reply Brief in support of its Motion in Limine to Exclude the Testimony of Mr. Alan Friedman under seal. The Exhibits to the Motion for Leave are the proposed Reply brief (Exhibit A); the Supplemental Affidavit of Eric J. Lorenzini (and attached exhibit) (Exhibit B); and Supplemental Affidavit of Keith Hendricks (Exhibit C).

Abbott respectfully requests that the above referenced documents be impounded until further Order of the Court. In addition, Abbott respectfully requests that the Court accept the documents provisionally under seal pending the Court's ruling on this Motion. Upon termination of the impoundment period, Abbott will retrieve and take custody of the documents.

The grounds for this motion are that the above referenced documents contain confidential

and competitively sensitive information regarding Abbott's development of various drug compounds, Abbott's probabilities of success for various drug compounds, and Abbott's internal projections regarding various drug compounds. Disclosure of the information contained in these documents could cause competitive harm by providing competitors with proprietary information regarding Abbott's drug development program, as well as its market analysis and business strategies. Hancock does not oppose this motion.

ABBOTT LABORATORIES

By its attorneys

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Dated: Oct. 23, 2007

**LOCAL RULE 7.1 CERTIFICATION**

The undersigned hereby certifies that counsel for Abbott Laboratories has conferred with counsel for Plaintiffs in a good faith effort to resolve or narrow the issues in this Motion. Plaintiffs' counsel has confirmed that Plaintiffs do not oppose this motion.

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/s/ Michael S. D'Orsi

Date: Oct. 23, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on October 23, 2007.

Date: October 23, 2007

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/s/ Michael S. D'Orsi